

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
Case No.: 3:20-cv-00276-KDB-DSC

MANUEL ROLDAN, on behalf of himself and)
all others similarly situated,)
)
 Plaintiff,)
)
 v.)
)
 BLAND LANDSCAPING COMPANY, INC.,)
)
 Defendant.)
)
 _____)

**JOINT NOTICE TO ADVISE THE COURT THAT THE PARTIES HAVE REACHED A
SETTLEMENT AGREEMENT TO RESOLVE ALL CLAIMS AT ISSUE IN THIS
LITIGATION**

NOW COME the Parties, jointly, by and through their counsel, to advise the Court that the Parties mediated on April 21, 2022 and have reached a settlement agreement in principle, to be finalized in a formal, written settlement agreement, to resolve the claims asserted by the Named Plaintiff on behalf of himself and all Foremen in North Carolina during the relevant time period pursuant to the Fair Labor Standards Act (“FLSA”) and North Carolina Wage and Hour Act (“NCWHA”) and Rule 23 of the Federal Rules of Civil Procedure. Plaintiff expects to submit an agreed-upon Unopposed Motion for Preliminary Approval of Class-Wide Settlement, Proposed Settlement Agreement, and all other related documents to the Court, within forty-five (45) days from the date of this filing.

Respectfully submitted this April 22, 2022.

/s/ Gilda A. Hernandez
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Charlotte C. Smith (NCSB #53616)

/s/ Matthew A. Abee
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Attorneys for Bland Landscaping Company,

Inc.

CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2022, I electronically filed the foregoing true and accurate copy of the **JOINT NOTICE TO ADVISE THE COURT THAT THE PARTIES HAVE REACHED A SETTLEMENT AGREEMENT TO RESOLVE ALL CLAIMS AT ISSUE IN THIS LITIGATION** with the Court using the CM/ECF system, and have thereby electronically served the document to the following:

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